

REACH and nickel compounds Update

France Capon

Senior Advisor, Chemicals Management (NI)

28 August 2012

San Diego (California, USA)



Report Documentation Page				Form Approved OMB No. 0704-0188	
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
1. REPORT DATE 28 AUG 2012		2. REPORT TYPE		3. DATES COVERED 00-00-2012 to 00-00-2012	
4. TITLE AND SUBTITLE REACH and nickel compounds Update				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Nickel Institute,Brookfield Place ,161 Bay Street, Suite 2700 ,Toronto, Ontario Canada M5J 2S1 ,				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT Approved for public release; distribution unlimited					
13. SUPPLEMENTARY NOTES ASETSDefense 2012: Sustainable Surface Engineering for Aerospace and Defense Workshop, August 27-30, 2012, San Diego, CA. Sponsored by SERDP/ESTCP.					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 15	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			

- *Presentation of the Nickel Institute*
- *Introduction*
- *REACH process: status of nickel chemicals and trends*
- *Nickel Institute related activities*
- *Nickel Institute related activities for 2013*
- *Conclusions*

The Nickel Institute



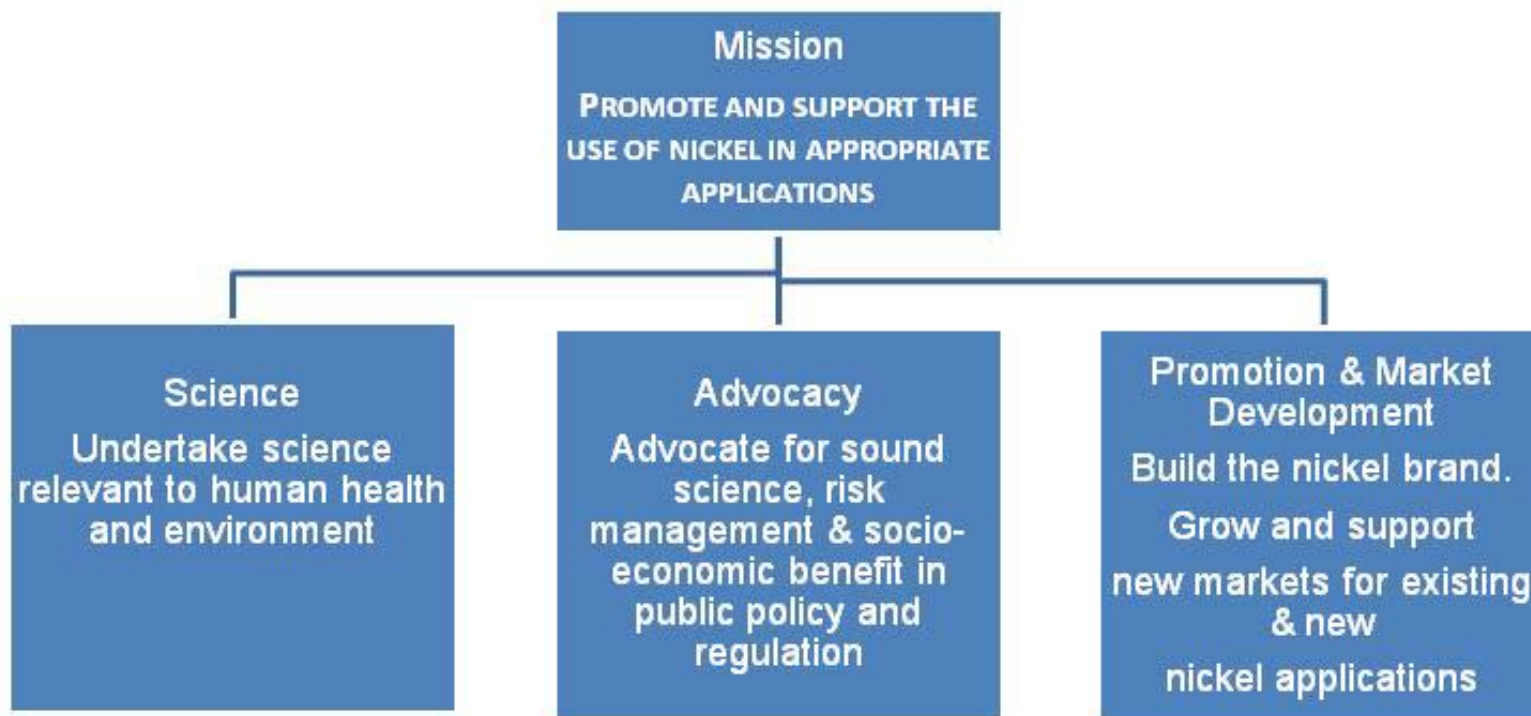
- Nickel and Ni compounds producing companies
- All major nickel Companies and a growing number of emerging producers (in total 27 companies)
- Comprising ~80% world primary nickel production

The Nickel Institute

28
58.693

Ni

Nickel



REACH: A Very Brief Summary

28
58.693

Ni

Nickel

A single, coherent **chemicals management system** for new and existing chemicals with the following three new elements

- **R**egistration
- **E**valuation
- **A**uthorisation of **CH**emicals



A tiered approach to “all chemicals” with focus on chemicals of high volumes, or of high concern

REACH and Authorisation Process: Introduction

28
58.693

Ni

Nickel

- REACH Authorisation objective & focus:
 - identifying substances of very high concern (SVHC);
 - listing them on a candidate list;
 - subjecting them to potential restriction (authorization process) with a strong focus on substitution.
- Political expectations and objectives of the REACH authorisation process are **HIGH**:
 - Already resulted in proliferation of lists (the “SIN list” and others)
 - EU goal: **136 substances listed as SVHC by end of 2012!**

Listing & Authorisation: process

28
58,693

Ni

Nickel



Member State or ECHA prepares an Annex XV dossier



SVHC
Status




Authorities and interested parties
SVHC properties and uses

Candidate List table

Note: The Ni number identifies each substance and indicates the status of the substance. The Ni number is included only for the substances that are not on the list. The Ni number is not included for the substances that are on the list.

Candidate List table

Substance Name	EC Number	EC Name	EC CAS	EC EINECS	EC ELINCS	EC ECHA	EC ECHA	EC ECHA	EC ECHA
1,1,1,2,2,2-hexafluoroethane	205-400-2	140-00-9	2011-12-19	001770001	001770001	001770001	001770001	001770001	001770001
1,1,1,2,2,2-hexafluoroethane	205-400-2	140-00-9	2011-12-19	001770001	001770001	001770001	001770001	001770001	001770001
1,1,1,2,2,2-hexafluoroethane	205-400-2	140-00-9	2011-12-19	001770001	001770001	001770001	001770001	001770001	001770001
1,1,1,2,2,2-hexafluoroethane	205-400-2	140-00-9	2011-12-19	001770001	001770001	001770001	001770001	001770001	001770001
1,1,1,2,2,2-hexafluoroethane	205-400-2	140-00-9	2011-12-19	001770001	001770001	001770001	001770001	001770001	001770001

84

Candidate List

In August 15 additional proposals to identify SVHC have been sent to ECHA

Prioritisation



Authorities and interested parties
Priorities and exemptions

Priority List – Annex XIV

Journal officiel de l'Union européenne L 284

Annexe XIV

14

Key message: Nickel compounds NOT yet proposed

	Submitters/submission deadlines	Jun 2008	Aug 2009	Feb 2010	Aug 2010	Jan-Feb 2011	Aug 2011	Jan 2012	Jul 2012	Jan 2013	Total submissions per country
1	ECHA		1			5	6	6	2-3?		18
2	Austria	2	1		2		1		1		7
3	Belgium					1		2			3
	Bulgaria										
	Cyprus										
	Czech Republic										
4	Denmark			2		1				2?	3
	Estonia										
	Finland										
5	France	5	3	5		1	3				17
6	Germany	2	8	1	5		6	2	6	2	32
	Greece										
	Hungary										
	Iceland										
	Ireland										
	Italy								3?		3?
	Latvia										
	Lithuania										
	Luxemburg										
	Malta										
7	Netherlands	1	1		4			3	2		11
8	Norway	3					3				6
	Poland									1	1
	Portugal										
	Romania										
9	Slovakia						1				1
	Slovenia										
	Spain										
10	Sweden	2							4		6
11	United Kingdom	1							1?		1
	Total submissions per deadline:	16	14	8	11	8	20	13	13	3	103
	Total submitters:	11									

Legend:

active submitter

modest submitter

average submitter

no submissions

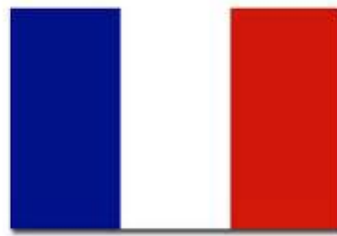
Important step:

-**No nickel** containing chemicals **proposed** for listing!

- 20 **Pb** compounds have been proposed in August 2012!!!

-**Cd and two Cd compounds** could be proposed by Sweden... in April 2013.

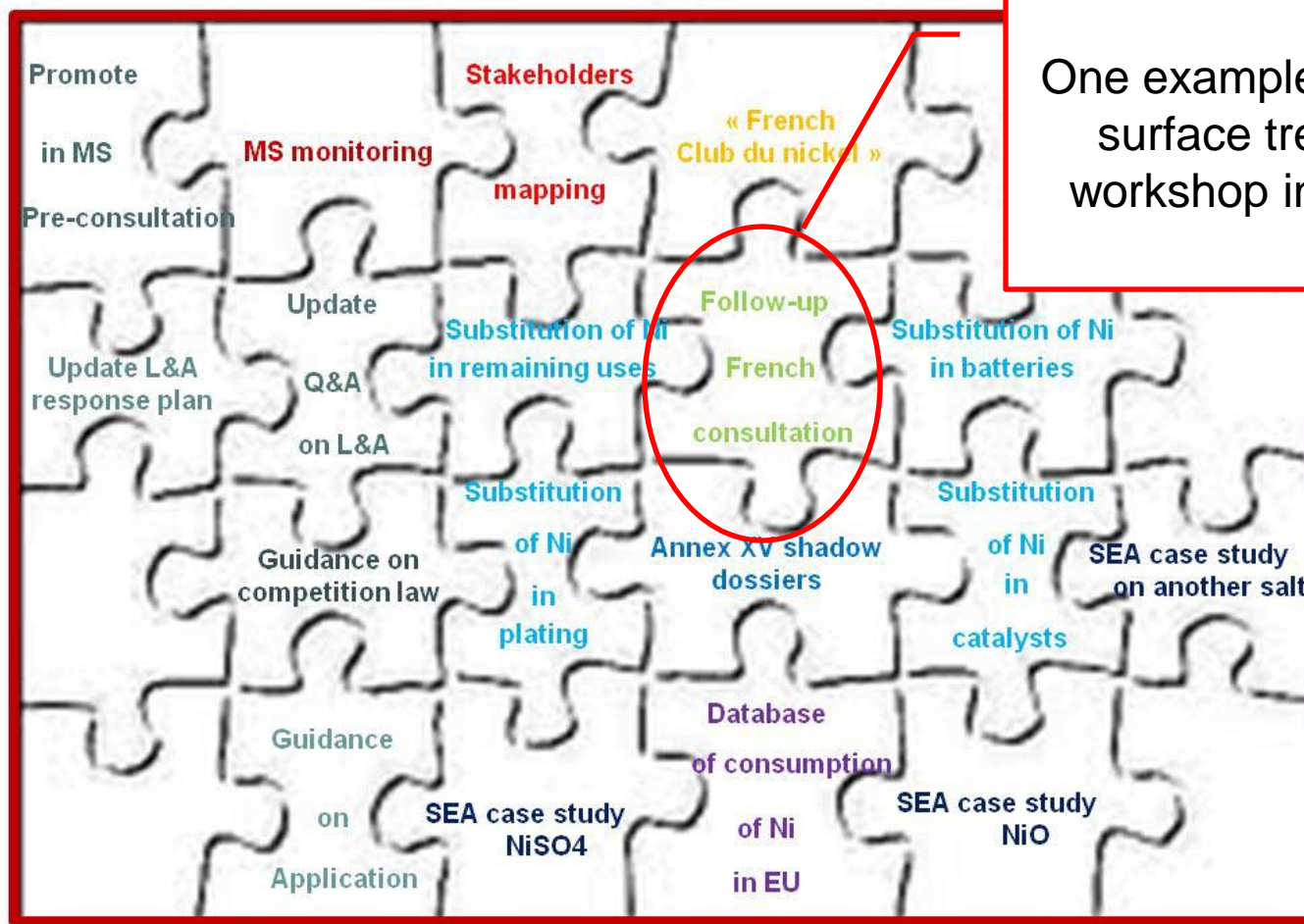
- **2008-2012: French review process**



= > No proposal to list to European Chemicals Agency !

- **2012-2013: Ongoing collaboration between industry and government on 12 Nickel containing chemicals!**

Ni related activities

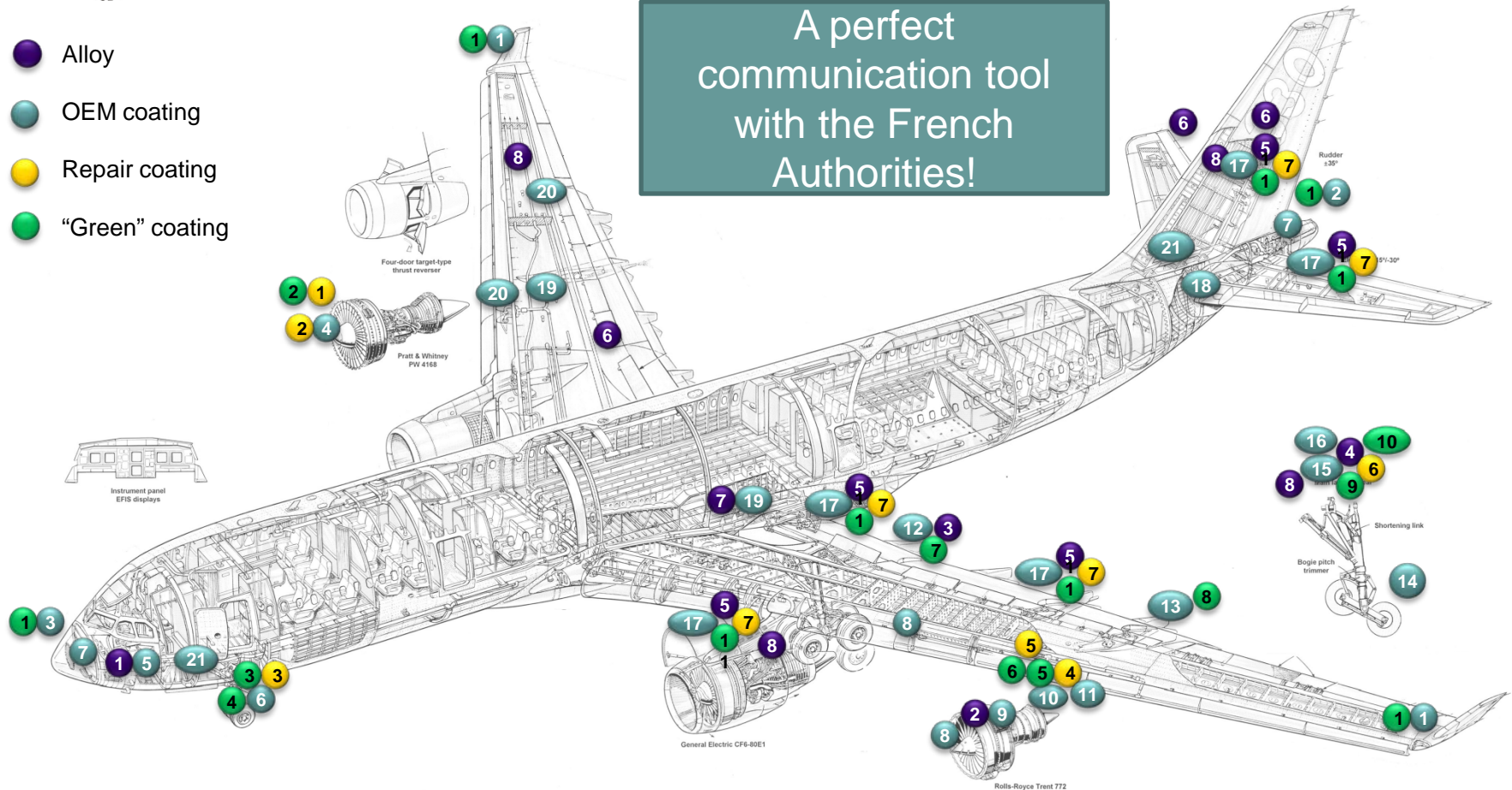


One example: visit of a surface treatment workshop in France!

Nickel: the versatile metal

- Alloy
- OEM coating
- Repair coating
- "Green" coating

A perfect
communication tool
with the French
Authorities!



● 9 Fasteners 4340 steel everywhere

● 12 ● 22 ZnNi plated - everywhere

Technical and Regulatory activities: International

28
58.693

Ni

Nickel



Technical and Regulatory activities: North America

28
58.693

Ni

Nickel



High focus since Authorisation mainly an EU issue



Key messages on Authorisation included in other advocacy activities (e.g.: raw material initiative)



A key priority: Asia and North America



Important to inform on Authorisation and avoid transposition of identical regulation

The partnership with NASF is critical!

High level of activities

Conclusions



- **Risk** for key nickel containing chemicals to be authorized under REACH
- Authoriation is an extremely **heavy and complex process**
- **Proactive involvement** of the Nickel industry
- **Close collaboration** with the Authorities is essential (e.g.: relationship with the French Authorities)
- **Active involvement of the whole supply chain at international level** is critical!
- **Technical resource: active and efficient stakeholders network** is key (e.g.: partnership between the NI and NASF)!
- **Risk of impacting US regulation due to stigmatization of nickel chemicals**

REACH and nickel compounds Update

France Capon

Senior Advisor, Chemicals Management (NI)

28 August 2012

San Diego (California, USA)

